

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
NORTHERN DIVISION**

## **TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

**COMES NOW** Diana S. Daugherty, Standing Chapter 13 Trustee, and for her objection to confirmation states as follows:

1. Box 1.1 or 1.2 are marked as "included."
2. The Mandatory Model Plan has not been used or has been modified. The current version of the Mandatory Model Plan is available on the Bankruptcy Court's website.
3. The set monthly payments to be made by the Trustee exceed the plan payment.
4. The plan does not contain enough funds to pay secured and priority creditors in full and pay the amount guaranteed to general unsecured creditors (if any). 11 U.S.C. §§ 1322(a)(2) and 1325(a)(5)(B)(ii). The approximate amount of the shortfall is \$9,460.
5. Debtors fail to list a cure period in paragraph 3.5(C).
6. Paragraph 3.9(B) provides for surrender of collateral, but fails to select either option.

**WHEREFORE** the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: May 15, 2019

/s/ Kathy Reichbach

Kathy Reichbach MO56957

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on May 15, 2019, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on May 15, 2019.

JEREMY DUANE MAST  
KARIE VIRGINIA MAST  
212 E CURTIS STREET  
MARCELINE, MO 64658

/s/ Kathy Reichbach  
Kathy Reichbach MO56957